UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

PC Code: 118203
DP Barcode: 352432

MEMORANDUM June 4, 2008

SUBJECT: EFED Comments on BASF's Response to the Environmental Deficiency Letter for Saflufenacil (BAS 800 H Technical)

TO: Kathryn Montague, Risk Manager
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Herbicide Branch
Registration Division (7505P)

FROM: Anita Pease, Senior Biologist A Pease 6/4/08
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THROUGH: Elizabeth Behl, Branch Chief E Behl 6/4/08
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The Environmental Fate and Effects Division (EFED) has completed its review of BASF's response to the Environmental Deficiency letter for saflufenacil (BAS 300 H Technical) and offers the following comments:

I. FATE deficiencies (Required now)

(FATE-1)
EPA guideline: 835.4200
PMRA DACO: 8.2.3.4.4
OECD point: IIA 7.1.2 and IIA 7.2.4
Required DATA: Anaerobic soil metabolism study for parent

USEPA is satisfied with the BASF response.

(FATE-2)
EPA guideline: 835.7100

PMRA DACO: 8.2.2.3
OECD point: IIA 4.5
Required DATA: Independent laboratory validation of the submitted analytical method in water

USEPA is satisfied with the BASF response.

(FATE-3)
EPA guideline: 835.1240
PMRA DACO: 8.2.4.3
OECD point: IIA 7.4.3, IIA 7.4.4, IIA 7.4.5, and IIA 7.4.7
Required DATA: Any soil column leaching or lysimeter studies that were conducted

USEPA is satisfied with the BASF response.

II. ECOTOXICITY deficiencies (Required now)

(ECO-1)
EPA guideline: 850.5400
PMRA DACO: 9.8.2
OECD point: IIA 8.4
Required DATA: Toxicity of most important metabolite relevant to aquatic organisms (possibly M07) to *Pseudokirchneriella subcapitata*

The additional data submitted by BASF in Appendices I and II are sufficient to characterize the potential toxicity of the saflufenacil metabolites (M07 and M08). Based on the available data, it appears that M07 and M08 are less toxic than the parent to plants. However, USEPA requests that BASF provide a full description of the methodology, including the names and source of all test plants, used in the non-guideline greenhouse studies included as Appendix I. In addition, justification for the lack of data for M02, which appears to be structurally similar to the parent compound, should be provided.

(ECO-2)
EPA guideline: 850.4400
PMRA DACO: 9.8.5
OECD point: IIA 8.6
Required DATA: Toxicity of most important metabolite relevant to aquatic organisms (possibly M07) to *Lemna* spp.

USEPA is satisfied with the BASF response.

(ECO-3)
EPA guideline: 850.1035
PMRA DACO: 9.4.2
OECD point: IIA 8.3.1.3

Required DATA: Toxicity of most important metabolite relevant to aquatic organisms (possibly M07) to *Americamysis bahia*

USEPA is satisfied with the BASF response.

(ECO-4)
EPA guideline: not applicable
PMRA DACO: 9.2.5 and 9.2.6
OECD point: IIA 8.8.1.1 and IIA 8.8.1.2
Required DATA: Tier I testing with *Aphidius rhopalosiphi* and *Typhlodromus pyri* using BAS 800H and BAS 781H formulations

These studies are not required by USEPA; therefore, the Agency defers to PMRA and DEWHA to evaluate the acceptability of BASF's response.

(ECO-5)
EPA guideline: not applicable
PMRA DACO: 9.9
OECD point: IIA 8.10.1 and IIA 8.10.2
Required DATA: Effects of parent on soil nitrification and carbon mineralization

These studies are not required by USEPA; therefore, the Agency defers to PMRA and DEWHA to evaluate the acceptability of BASF's response.

(ECO-6)
EPA guideline: 850.4225 and 850.4250
PMRA DACO: 9.8.4
OECD point: IIA 8.12
Required DATA: Any studies conducted on toxicity of soil metabolites to terrestrial plants

Please see USEPA response to (ECO-1) above.

(ECO-7)
EPA guideline: 850.1075
PMRA DACO: 9.5.4
OECD point: IIIA 10.2.2.1
Required DATA: Acute toxicity of BAS 781H to *Oncorhynchus mykiss*

USEPA is satisfied with the BASF response. USEPA will use the available toxicity data for dimehenamid-p, which indicates greater toxicity to aquatic receptors as compared to saflufenacil, to assess aquatic organism risk based on exposure to BAS 781H.

(ECO-8)
EPA guideline: 850.1010
PMRA DACO: 9.3.5

OECD point: IIIA 10.2.2.2
Required DATA: Acute toxicity of BAS 781H to *Daphnia magna*

Please see USEPA response to (ECO-7) above.

(ECO-9)
EPA guideline: 850.5400
PMRA DACO: 9.8.6
OECD point: IIIA 10.2.2.3
Required DATA: Acute toxicity of BAS 781H to *Pseudokirchneriella subcapitata*

Please see USEPA response to (ECO-7) above.

(ECO-10)
EPA guideline: 850.4400
PMRA DACO: 9.8.6
OECD point: IIIA 10.8.2.1
Required DATA: Acute toxicity of BAS 781H to *Lemna* spp.

Please see USEPA response to (ECO-7) above.